

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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| IN RE: | : | CHAPTER 13 |
| HAROLD EUGENE CLARK, SR | : | CASE NO. 1:17-bk-02060 |
| aka Harold Eugene Clark | : | |
| JACKQYLN DALE CLARK | : | |
| Debtors | : | |
| | : | |
| US BANK NATIONAL ASSOCIATION, | : | |
| as Trustee, Successor in Interest to | : | |
| Wachovia Bank, National Association, | : | |
| (formerly known as First Union National | : | |
| Bank) as Trustee, for Long Beach | : | |
| Mortgage Loan Trust 2001-4, | : | |
| Movant | : | |
| | : | |
| v. | : | |
| HAROLD EUGENE CLARK, SR | : | |
| aka Harold Eugene Clark | : | |
| JACKQYLN DALE CLARK, | : | |
| Respondents | : | |

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted; however, Jackqyln Dale Clark is deceased and title has therefore vested in Harold Eugene Clark, Sr.
3. Admitted.
4. Admitted.
5. Admitted on information and belief per Movant's recitations..
6. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
7. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's review of payments made..

8. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
9. Proof of amounts owed is demanded at trial and this paragraph is therefore denied,
10. Denied that Movant has demonstrated cause for relief from stay.
11. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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